

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FILED  
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GREGORY J. LAUREANNO, \*

Plaintiff \*

v. \*

THEODORE WILLIAM BACALIS \*

Defendant \*

\*\*\*\*\*

C.A. NO. 04-11592 RCL

JOINT MOTION OF THE PARTIES TO AMEND THE SCHEDULING ORDER DATES

Now come the parties in the above-captioned case and respectfully move this Honorable Court to amend the scheduling order dates. As grounds therefore, the parties are engaged in settlement negotiations and desire a brief extension of these dates so as to avoid unnecessary costs and expenses. The parties have completed fact discovery and the remaining discovery dates regard expert witnesses. All other dates will remain the same as set on December 2, 2004. The proposed expert witness discovery dates are as follows:

- |  |         |
|--|---------|
| 8. Rule 26(a)(2)(B) Disclosure of Trial Experts by Plaintiff   | 9/1/05  |
| 9. Rule 26(a)(2)(B) Disclosure of Trial Experts by Defendants  | 10/1/05 |
| 10. Completion of Depositions of Plaintiff's Trial Experts     | 11/1/05 |
| 11. Completion of Depositions of Defendants' Trial Experts     | 11/1/05 |
| 12. Summary Judgment Motions filed with the Court by this date | 1/15/06 |
| 13. Pre-Trial Conference                                       | 2/16/06 |

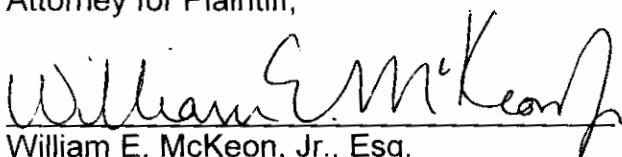
14. Final pre-trial conference held and firm trial date set

15. Case disposed

4/15/06

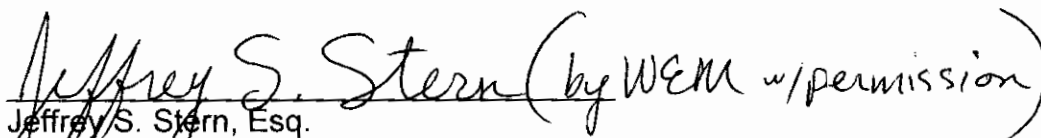
Respectfully submitted,

Attorney for Plaintiff,

A handwritten signature in cursive script, reading "William E. McKeon, Jr.", written over a horizontal line.

William E. McKeon, Jr., Esq.  
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Attorney for Defendant,

A handwritten signature in cursive script, reading "Jeffrey S. Stern (by WEM w/permission)", written over a horizontal line.

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Dated: June 23, 2005